Immanuel J. Herrmann, *Pro Se* Daniel A. Frishberg, *Pro Se* 

## UNITED STATES BANKRUPTCY COURT SOUTHERN DISTRICT OF NEW YORK

	)	
In re:	)	Chapter 11
	)	
CELSIUS NETWORK LLC, et al.,1	)	Case No. 22-10964 (MG)
	)	
Debtors.	)	(Jointly Administered)
	)	,

JOINDER TO RESPONSE TO DEBTORS' MOTION SEEKING ORDER (I) AUTHORIZING THE DEBTORS TO ENTER INTO WITNESS COOPERATION AGREEMENTS, (II) AUTHORIZING REIMBURSEMENT OF PAST AND FUTURE OUT OF POCKET EXPENSES OF COOPERATING WITNESSES AND (III) GRANTING RELATED RELIEF

Creditors Immanuel J. Herrmann and Daniel A. Frishberg hereby submit this joinder to the Response to Debtors' Motion Seeing Order (i) Authorizing the Debtors to Enter into Witness Cooperation Agreements, (ii) Authorizing Reimbursement of Past and Future Out of Pocket Expenses of Cooperating Witnesses and (iii) Granting Related Relief and respectfully state as follows:

<sup>&</sup>lt;sup>1</sup> The Debtors in these chapter 11 cases, along with the last four digits of each Debtor's federal tax identification number, are: Celsius Network LLC (2148); Celsius KeyFi LLC (4414); Celsius Lending LLC (8417); Celsius Mining LLC (1387); Celsius Network Inc. (1219); Celsius Network Limited (8554); Celsius Networks Lending LLC (3390); Celsius US Holding LLC (7956); GK8 Ltd. (1209); GK8 UK Limited (0893); and GK8 USA LLC (9450). The location of Debtor Celsius Network LLC's principal place of business and the Debtors' service address in these chapter 11 cases is 50 Harrison Street, Suite 209F, Hoboken, New Jersey 07030.

**JOINDER** 

We fully join in this filing and its request for relief. We have been selected by the Debtors as a

"bellwether claimants." We both filed timely claims in these cases and have determined that we

"find the information contained in these interviews necessary or beneficial in connection with the

prosecution of [our] proofs of claim."

We intend to request these items during the discovery process for our claims litigation, if they are

not generally available. We both signed protective orders in previous litigation with the Debtors.

Any creditor who needs transcripts of the Cooperating Witness interviews for their claims

litigation should have them. Therefore, we respectfully join in the request "that the Court

condition the granting of the relief requested in the Expense Motion on permitting access to the

transcripts of the Cooperating Witness interviews to creditors who have filed timely proofs of

claim in these chapter 11 cases (subject, if necessary, to execution of a protective order), and

granting such other and further relief as is just and proper."

Respectfully,

Immanuel J. Herrmann

Pro Se

/s/ Immanuel J. Herrmann

April 10, 2023

Daniel A. Frishberg

Pro Se

<u>/s/ Daniel A. Frishberg</u>

April 10, 2023